

3. In actions predicated on diversity jurisdiction, an explanation of whether any Defendants who have been served are citizens of South Carolina.

This action is predicated on diversity jurisdiction. Defendant Exclusive Moving and Delivery, LLC is a corporation that is incorporated in North Carolina, and which maintains its principal place of business in Charlotte, North Carolina. None of its members reside in South Carolina. Defendant Franklyn F. Rodriguez is a citizen of North Carolina who resides in Charlotte, North Carolina.

4. In actions predicated on diversity jurisdiction, the basis for believing that the amount in controversy exceeds \$75,000.00.

Defendants made an Offer of Judgment in the amount of \$75,001.00 on June 26, 2025. Under Rule 68 of the South Carolina Rules of Civil Procedure, an offer of judgment expires twenty days after notification, and is considered rejected if the offeree does not file a written acceptance of the offer. Plaintiff did not accept Defendants' Offer of Judgment before it expired. By operation of Rule 68, SCRPC, Plaintiff rejected Defendants' offer of \$75,001.00.

5. If removal takes place more than thirty days after any Defendant first received a copy of the summons and complaint, the reasons why removal has taken place at this time and the date on which Defendants first received a paper identifying the basis for such a removal.

Not applicable. Removal was made within 30 days of both Defendants first receiving a copy of the summons and complaint.

6. In actions removed on the basis of this Court's diversity jurisdiction, in which the action in state court was commenced more than one year before the date of

removal, the reasons why this action should not summarily be remanded to state court.

Not applicable. Plaintiff filed this action in state court on June 11, 2025.

7. The identity of any Defendant who Plaintiff served prior to the time of removal who did not formally joint in notice of removal and the reasons therefor.

None.

Defendants' counsel is serving a copy of the Standing Order upon Plaintiff's counsel with this response.

Respectfully submitted this 21st day of July 2025.

By: /s/ W. James Flynn
W. James Flynn
SC District Court Bar No. 9154
4000 S. Faber Place Drive
Charleston, SC 29405
jflynn@chartwelllaw.com
(704) 313-6645 Phone
(610) 666-7704 Fax
Attorneys for Defendants Exclusive Moving and Delivery,
LLC and Franklyn E. Rodriguez

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that I have this day served a copy of the within and foregoing **Defendants' Statement in Response to Standing Order Regarding All Removed Cases to Judge Mary Geiger Lewis** via electronic filing using the Court's electronic filing system, which will send notification and a copy to the counsel of record as follows via regular mail and electronic correspondence:

James G. Biggart, II
M. Cooper Klaasmeyer
Morgan & Morgan PA
4401 Belle Oaks Dr., Suite 300
N. Charleston, SC 29405
jbiggart@forthepeople.com
cooper.klaasmeyer@forthepeople.com

This 21st day of July, 2025.

CHARTWELL LAW, LLP

/s/ W. James Flynn
W. James Flynn
SC District Court Bar No. 9154

Counsel for Defendants

4000 S. Faber Place Drive
Charleston, SC 29405
Phone: (704) 313-6645
Fax: (610) 666-7704
jflynn@chartwelllaw.com